

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

RODERICK COOPER #180136
DON MARTIN # 184335

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Full name and prison number of
plaintiff(s)

v.

CIVIL ACTION NO. 2:05cv982-D
(To be supplied by the Clerk of the
U.S. District Court)

LOUIS BOYD (DEPUTY WARDEN)

ARNOLD HOLT (ACTIVE WARDEN)

SYLVESTER NETTLES (CAPTAIN)

DONAL CAMPBELL (COMM)

Name of person(s) who violated
your constitutional rights.
(List the names of all the persons)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? Yes () No (X)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? Yes (X) No ()

During the previous 12 months,
has there been any contact with any of the persons listed above?

N/A

Has there been any contact with any of the persons listed above in the
court?

3. Docket No. _____
4. Name of Judge to whom case was assigned _____
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT LIMESTONE CORRECTIONAL FACILITY
28779 NICK DAVID ROAD HARVEST, ALABAMA 35749 - 7009

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED BULLOCK COUNTY CORRECTIONAL FACILITY HWY. 82 EAST UNION SPRINGS AL. 36089

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	LOUIS BOYD	P.O. BOX 5107 UNION SPRINGS, AL. 36089
2.	ARNOLD HOLT	P.O. BOX 5107 UNION SPRINGS, AL. 36089
3.	SYLVESTER NETTLES	P.O. BOX 5107 UNION SPRINGS, AL 36089
4.	DONAL CAMPBELL	1400 Lloyd Street MONTGOMERY, AL 36107

THE DATE ON WHICH THE VIOLATION OCCURRED AUGUST, 18, 2004

THE TYPE OF VIOLATION OF YOUR CONSTITUTIONAL RIGHTS THAT YOU ALLEGE

THE TYPE OF VIOLATION OF YOUR CONSTITUTIONAL RIGHTS THAT YOU ALLEGE RACIAL DISCRIMINATION

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place, manner, and person involved).

- SEE ATTACHED SHEETS -

GROUND TWO: EQUAL PROTECTION (14th AMENDMENT)

SUPPORTING FACTS: _____

GROUND THREE: _____

SUPPORTING FACTS: _____

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

We would like for this Court to enter an injunction ORDERING THE WARDENS
TO ALLOW US TO COME BACK TO BULLOCK CORRECTIONAL FACILITY TO FINISH
THE REMAINDER OF OUR SENTENCES AND TO BE CLOSER TO HOME.

Federick Cooper

Don Martin

I declare under penalty of perjury that the foregoing is true and correct.

WITNESSED on October 4, 2005

Federick Cooper

Don Martin

G R O U N D # 1**DISCRIMINATION**

___ On or about the 18,of August the plaintiffs in the above lawsuit was transferred to Limestone Correctional Facility,in Capshaw, Harvest, Alabama over 289 miles away from the current facility that they were house for the alleged reason (s) of being drug dealers inside of the institution although none of the plaintiffs had actually been caught with any drugs,nor drug paraphernalia,nor any other other prison contraband that would lead the Prison Administration to believe that they ever were in fact dealing drugs inside of the institution.But because the plaintiffs resided in the community that was nonthe-less 10 minutes or less from the institution in which they were housed,all drug activity was assumed to have been transacted by and through the plaintiffs because they were black and all were [from] high drug and crime areas in their neighborhoods. Captain C. Nettles questioned all of the plaintiffs and relayed the message from the warden(s) that they were the only black guys with connection(s) with their officers that could have drugs bought into the Institution. The plaintiffs was never afforded a opportunity to try and disprove,the facts supposedly that was presented to the administration by a (anonymous)_source from within the institution.Nonetheless the plaintiffs were placed not on notice of transfer,and one was placed inadministration segregation for (90) days until he gave up his horse,or the person who was bringing the drugs into the Institution to them thus this lawsuit.

G R O U N D # 2**EQUAL PROTECTION OF LAW 14th Amend.**

The plaintiffs alleges that they were further transfered and harassed by the prison administration because some of the officer in which were employed at the Bullock Correctional Facility had grew up, and gone to school with the said plaintiffs. Plaintiff(s) explained to the administration that they were not at all trying to cause any problems, being that they were close to home and could see their families, and that they wanted to get out of prison, and that regardless of wheter or not that they knew the officers personally, or formally that they (the plaintiffs) had not been involved in anything illegal in the time that they had ben incarcerated. Administration insisted that the plaintiffs were to familiar with the officers and palced that into the plaintiffs prison files and thus transferred them far away from home because they would not supposedly tell the authorities who was bringing in the drugs. Plaintiffs further explained to the Captain .Assistance Warden, and Warden that at every institution in the state had officers and inmates that knew each other from the streets and had some type of relationship from the streets and that it was unfair to transfer them just because they knew most of the officers that worked in the facility, thus this violated the palintiffs **Equal Protection Rights** because if that was not the case then there would have to be transfers done statewide because nobody would want to be far from home because they knew some of the officers that worked in the institution in which they were housed.